

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

DIGITAL MEDIA SOLUTIONS, LLC,

*Plaintiff,*

v.

SOUTH UNIVERSITY OF OHIO, LLC, *et al.*,

*Defendants.*

CASE NO. 1:19-cv-145

Judge Dan Aaron Polster

Magistrate Judge Thomas M. Parker

**INTERVENORS EMMANUAL DUNAGAN, JESSICA MUSCARI, ROBERT J. INFUSINO, AND STEPHANIE PORRECA'S MOTION FOR EXPEDITED DISCOVERY AND FOR EXPEDITED BRIEFING**

Pursuant to Rules 33, 34, and 36 of the Federal Rules of Civil Procedure, Intervenors Emmanuel Dunagan, Jessica Muscari, Robert J. Infusino, and Stephanie Porreca (collectively, the “*Dunagan* Intervenors”) hereby move this Court for an Order requiring the Receiver to provide expedited responses to discovery served by the *Dunagan* Intervenors in connection with the Receiver’s Motion for Approval of Settlement and Bar Order [Dkt. 674] and for expedited briefing on this Motion. The *Dunagan* Intervenors request the Court direct the Receiver to Respond to this Motion by Wednesday April 14, 2021, rather than the fourteen-day time frame provided in the Local Rules as this discovery relates to a hearing scheduled for May 8, 2021, with the *Dunagan* Intervenors’ reply, if any, to be filed no later than April 15, 2021. The basis for the *Dunagan* Intervenors’ request for expedited discovery, and the nature of that discovery, are set forth more fully in the memorandum in support of this motion, which is incorporated herein by reference.

Specifically, the *Dunagan* Intervenors request that this Court enter an Order requiring that: (i) the Receiver’s objections, if any, be due by April 19; and (ii) the Receiver’s responses to

the requests, including all documents not subject to a pending objection in these proceedings, shall be due by April 26.

A copy of a proposed Order granting the *Dunagan* Intervenors' Motion for Expedited Discovery is attached hereto for the Court's convenience.

Dated: April 9, 2021

Respectfully Submitted,

/s/ Eleanor Hagan

Eleanor M. Hagan (Bar # 0091852)

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Counsel for Intervenors

Emmanuel Dunagan, Jessica Muscari, Robert J. Infusino, and Stephanie Porreca

**CERTIFICATE OF SERVICE**

It is hereby certified that a copy of the foregoing motion was served upon all counsel of record by the Court's electronic filing system this 9th day of April, 2021.

*/s/ Eleanor Hagan* \_\_\_\_\_

Eleanor Hagan

One of the Attorneys for Intervenors